

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>ePLUS INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action No. 3:09-CV-620 (REP)</b>
	)	
<b>v.</b>	)	
	)	
<b>LAWSON SOFTWARE, INC.,</b>	)	
	)	
	)	
<b>Defendant.</b>	)	

**NOTICE OF FILING ePLUS INC.'S OPPOSITION TO LAWSON'S MOTION TO  
STRIKE THE EXPERT OPINIONS OF DR. KEITH UGONE, AND  
ATTACHED EXHIBITS 4, 5, 6 and 8**

Plaintiff ePlus, Inc., by counsel, in accordance with the Amended Protective Order entered in this case on November 16, 2009, hereby gives notice that it has filed the following documents **UNDER SEAL** with the Court:

1. ePlus Inc.'s Opposition to Lawson's Motion to Strike the Expert Opinions of Dr. Keith Ugone, and
2. Exhibits 4, 5, 6 and 8 which are contained on compact disk.

A copy of the above-mentioned documents will be served on counsel for Defendant Lawson Software, Inc. electronically today.

February 22, 2012

Respectfully submitted,

ePLUS, INC.

By Counsel

/s/

---

Paul W. Jacobs, II (VSB #16815)  
Craig T. Merritt (VSB #20281)  
Henry I. Willett, III (VSB #44655)  
**CHRISTIAN & BARTON, LLP**  
909 East Main Street, Suite 1200  
Richmond, Virginia 23219-3095  
Telephone: (804) 697-4100  
Facsimile: (804) 697-4112  
[cmerritt@cblaw.com](mailto:cmerritt@cblaw.com)  
[pjacobs@cblaw.com](mailto:pjacobs@cblaw.com)  
[hwillett@cblaw.com](mailto:hwillett@cblaw.com)

Scott L. Robertson (*admitted pro hac vice*)  
Jennifer A. Albert (*admitted pro hac vice*)  
David M. Young (VSB #35997)  
**GOODWIN PROCTER LLP**  
901 New York Avenue, N.W.  
Washington, DC 20001  
Telephone: (202) 346-4000  
Facsimile: (202) 346-4444  
[srobertson@goodwinprocter.com](mailto:srobertson@goodwinprocter.com)  
[jalbert@goodwinprocter.com](mailto:jalbert@goodwinprocter.com)  
[dyoung@goodwinprocter.com](mailto:dyoung@goodwinprocter.com)

Michael G. Strapp (*admitted pro hac vice*)  
James D. Clements (*admitted pro hac vice*)  
**GOODWIN PROCTER LLP**  
Exchange Place, 53 State Street  
Boston, MA 02109-2881  
Telephone: (617) 570-1000  
Facsimile: (617) 523-1231  
[mstrapp@goodwinprocter.com](mailto:mstrapp@goodwinprocter.com)  
[jclements@goodwinprocter.com](mailto:jclements@goodwinprocter.com)  
Attorneys for Plaintiff, ePlus Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 22<sup>th</sup> day of February, 2012, I will electronically file the foregoing:

**NOTICE OF FILING EPLUS INC.'S OPPOSITION TO LAWSON'S MOTION  
TO STRIKE THE EXPERT OPINIONS OF DR. KEITH UGONE, AND  
ATTACHED EXHIBITS 4, 5, 6 and 8**

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

Christopher Dean Dusseault, <i>pro hac vice</i> Jason Lo, <i>pro hac vice</i> Timothy P. Best, <i>pro hac vice</i> GIBSON, DUNN & CRUTCHER LLP 333 S. Grand Avenue Los Angeles, CA 90071 Telephone: (213) 229-7000 Facsimile: (213) 229-6659 CDusseault@gibsondunn.com JLo@gibsondunn.com TBest@gibsondunn.com VAED-620ExternalServiceList@gibsondunn.com	Robert A. Angle, VSB#37691 Dabney J. Carr, IV, VSB #28679 Megan C. Rahman (VSB No. 42678) Timothy J. St. George (VSB No. 77349) TROUTMAN SANDERS LLP P.O. Box 1122 Richmond, Virginia 23218-1122 Telephone: (804) 697-1238 Facsimile: (804) 698-5119 robert.angle@troutmansanders.com dabney.carr@troutmansanders.com megan.rahman@troutmansanders.com tim.stgeorge@troutmansanders.com
Donald R. Dunner, <i>pro hac vice</i> Erika H. Arner, <i>pro hac vice</i> FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, L.L.P. 901 New York Avenue, N.W. Washington, DC 20001 Telephone: (202) 408-4000 Facsimile: (202) 408-4444 don.dunner@finnegan.com erika.arner@finnegan.com EXT-Lawson-FinneganCorrespondence@finnegan.com	Daniel J. Thomasch, <i>pro hac vice</i> Josh A. Krevitt, <i>pro hac vice</i> GIBSON, DUNN & CRUTCHER LLP 200 Park Avenue New York, NY 10166 Telephone: (212) 351-4000 Facsimile: (212) 351-6200 DThomasch@gibsondunn.com JKrevitt@gibsondunn.com VAED-620ExternalServiceList@gibsondunn.com
	Sarah E. Simmons, <i>pro hac vice</i> GIBSON, DUNN & CRUTCHER LLP 2100 McKinney Avenue , #1100 Dallas, TX 75201 Telephone: (214) 698-3100 Facsimile: (214) 571-2900 SSimmons@gibsondunn.com VAED-620ExternalServiceList@gibsondunn.com  <i>Counsel for Defendant Lawson Software, Inc.</i>

/s/

Paul W. Jacobs, II (VSB #16815)  
**CHRISTIAN & BARTON, LLP**  
909 East Main Street, Suite 1200  
Richmond, Virginia 23219-3095  
Telephone: (804) 697-4100  
Facsimile: (804) 697-4112  
pjacobs@cblaw.com  
Counsel for Plaintiff ePlus Inc.

1247905